

From: petersjoan petersjoan@bellsouth.net
Subject: Re: Request for Meet and Confer/ Doe v. Bonnell
Date: May 19, 2025 at 6:11 PM



To: Andrew Brettler abrettler@berkbrettler.com
Cc: Robert "Bob" L. Raskopf rraskopf@bilzin.com, Patricia M. Patino ppatino@bilzin.com, Jake Camara jcamara@berkbrettler.com, Joel Sichel jsichel@berkbrettler.com, Kai Alblinger kalblinger@berkbrettler.com, Carlos A. Garcia Perez cgarciaperez@smgqlaw.com, Gustavo D. Lage glage@smgqlaw.com

As I already stated, I can only share the KiwiFarms production upon your explicit agreement that it is for attorney's eyes only. Otherwise I do not have authority from KiwiFarms to share it.

On Monday, May 19, 2025, 05:54:11 PM EDT, Andrew Brettler <abrettler@berkbrettler.com> wrote:

Please send the Kiwi Farms production. Also please provide us with the unredacted declarations in light of today's order from the magistrate.

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On May 19, 2025, at 2:50 PM, Joan peters <petersjoan@bellsouth.net> wrote:

Andrew:

As you are aware, we served a subpoena on KiwiFarms. KiwiFarms has responded and we have received a response and partial production. We should be receiving an additional production in the next few days. KiwiFarms has restricted the production of these documents to attorney's eyes only. If you accept this restriction in writing, we will arrange for the documents to be shared with you.

I am also writing as a meet and confer on the following. KiwiFarms has consented to removing various links to the Video pursuant to a court order. We will be filing a motion requesting the court to enter the proposed agreed order. Do you have any objection to the same? Please advise by noon EST tomorrow.
thanks,
Joan